

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

DANIEL MORGAN GRADUATE	)	
SCHOOL OF NATIONAL SECURITY,	)	
	)	
	)	
Plaintiff,	)	
v.	)	Civil Action No.: 1:17-cv-576 (CMH/IDD)
	)	
LINDA MILLIS,	)	
	)	
Defendant.	)	
	)	
	)	
	)	

**PLAINTIFF'S [PROPOSED] STIPULATION OF UNCONTESTED FACTS**

1. Plaintiff Daniel Morgan Graduate School of National Security (formerly, Daniel Morgan Academy)(“DMGS”) is a 501(c)(3) nonprofit corporation incorporated and licensed in the District of Columbia and with its principal place of business in Washington, D.C.

2. Defendant Linda Millis (“Millis”) is an individual citizen of the Commonwealth of Virginia.

3. DMGS was founded in 2014 as a nonprofit corporation organized under the laws of the District of Columbia for the stated purpose of providing graduate school level education to students who are interested in careers in the national security and intelligence fields.

4. In May 2016, DMGS offered Millis a job at DMGS with an annual salary of \$150,000, and she started work on May 31, 2016.

5. In July 2016, Millis received the position title of Executive Director. In her role as Executive Director, Millis reported to the President of DMGS.

6. On August 29, 2016, the Board of Trustees of DMGS received information from Millis and others indicating that an individual named Mark Levin, an unpaid person, whose formal title was Special Advisor to the President of DMGS, may have engaged in inappropriate conduct with DMGS students and employees.

7. In her capacity as Executive Director of DMGS, Millis was privy to or participated in some attorney-client privileged communications between DMGS and its counsel relating to an internal investigation undertaken by DMGS into the conduct of Mark Levin.

8. On August 29, 2016, Levin was suspended from his role as Special Advisor to the President of DMGS pending further investigation, banished from the campus of DMGS, and directed to have no further contact with students or employees of DMGS.

9. On November 1, 2016, the Board of Trustees of DMGS met in executive session with its counsel to conduct an attorney-client privileged meeting to consider the report and recommendations of Elizabeth Watson Gramigna, outside counsel hired by DMGS to conduct an investigation into the Levin matter. Millis attended the meeting.

10. Millis received a 9-page "Executive Summary Report" prepared by Ms. Gramigna regarding Gramigna's investigation into the Levin matter.

11. On December 31, 2016, Millis's salary was increased to \$165,000 per year.

12. On March 28, 2017, Millis tendered her resignation of employment from DMGS.

Dated: January 18, 2018

Respectfully submitted,

/s/ Ronda B. Esaw

Ronda B. Esaw

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of January 2018, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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